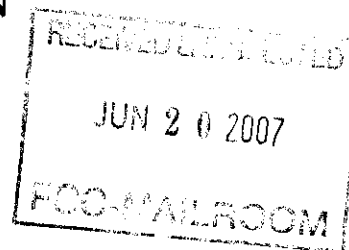


**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**



In the Matter of)	
)	
Wireless E911 Location Accuracy Requirements)	PS Docket No. 07-114
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Association of Public-Safety Communications)	
Officials-International, Inc. Request for)	
Declaratory Ruling)	
)	
911 Requirements for IP-Enabled Service Providers)	WC Docket NO. 05-196
)	

COMMENTS OF THE <Onondaga County Department of Emergency Communications

I. INTRODUCTION

< *Onondaga County Department of Emergency Communications* > provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-108, adopted by the Commission on May 31, 2007.

II. SUMMARY OF COMMENTS See discussion.

III. DISCUSSION

A. Emergency calls that cannot be accurately and quickly located could result in possible death, delay of emergency services or overall disruption of normal public services.

B. Public Safety needs to understand what we are getting in terms of accuracy in our community in order to serve the public. Using the FCC accuracy parameters as a reference allowed a point of comparison for the consistency and usefulness of location data delivered on E911 calls to the selected PSAP's. Performance of these systems was not widely made available but was an important learning experience. At the PSAP, the recognition of the degree of deviation associated with wireless location data has impact on call processing as well as dispatch capability. The degree of deviation must be understood per WSP in order to establish and assess actual capability within any service area.

C. The public's perception of the 9-1-1 Emergency Communications Center is that we will know

their location when they call in on their cell phone. Citizens get frustrated when they are asked so many question regarding their location etc. as they believe we already have that information.

D. COMMENTS OF CONCERN REGARDING SPECIFIC STATEMENTS CONTAINED IN THE NOTICE.

Emergency Centers cannot keep up financially with the continuing technology advancements in the wireless arena. Wireless accuracy for prompt response and assistance should not create further crisis by failing to deliver location data. The FCC needs to provide instruction through its independent regulatory role to the wireless carriers that location data delivered to the PSAP should improve to at least the parameters already defined by the FCC in earlier proceedings on this docket.

IV. CONCLUSION

- **I strongly support APCO's position on wireless location testing at the PSAP level. This is critical as we saw significant issues when testing at the Onondaga County Department of Emergency Communications Center. The testing did have the added benefit of increasing our understanding of wireless location and the need for re-bidding for better information. I ask the Commission to rule in favor of PSAP level accuracy and in favor of the APCO petition. We need a timeline to reach the desired goal.**

Respectfully Submitted,



COMMISSIONER
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